

# Stakeholder Engagement Plan

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## Damietta Port Modernisation Project, Egypt

October 2023



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**Public**

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## Acronyms and Abbreviations

AIIB – Asian Infrastructure Investment Bank

CT2 – Container Terminal 2

DEG - Deutsche Investitions- und Entwicklungsgesellschaft

DPA – Damietta Port Agency

EBRD – European Bank for Reconstruction and Development

EEAA – Egyptian Environmental Affairs Agency

EIA – Environmental Impact Assessment

ESP – Environmental and Social Policy

IFC – International Finance Corporation

LNG - Liquefied Natural Gas

SEGAS - Spanish Egyptian Gas Company

SEP – Stakeholder Engagement Plan

WBG – World Bank Group

# 1. INTRODUCTION

## 1.1. Background

This Stakeholder Engagement Plan (SEP) provides the requirements for the stakeholder engagement and public consultation process, stakeholder identification and grievance mechanism planned for the Damietta Modernisation Project being developed by the Damietta Alliance Container Terminal S.A.E, (the “Consortium”), consisting of Hapag-Lloyd, Eurogate and Contship Italia, Middle East Logistics & Consultants Group and Ship & C.R.E.W. Egypt S.A.E.

The SEP provides an overview of national legislation, the frameworks of the European Bank for Reconstruction and Development (EBRD) Environment and Social Policy (ESP) 2019, International Finance Corporation (IFC), Deutsche Investitions-und Entwicklungsgesellschaft (“DEG”), Asian Infrastructure Investment Bank (AIIB), and Proparco (together, the “Lenders”), and international best practice related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a live document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

## 1.2. Objective of the Plan

This SEP is a public document, which sets out the implementing body’s commitments relating to stakeholder engagement, consultation, grievance management, and disclosure activities in connection with the proposed modernisation.

The Consortium will be responsible for the development of Project and the public will be able to access and review this SEP (in Arabic and English) at the site in Damietta as well as on the Project website which is under development.

The goal of this SEP is to set out how stakeholder engagement will be carried out for the Project and how long-term relationships between the Damietta Port Project and the local communities will be maintained. This SEP also aims to inform, improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in an inclusive and timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project through adequate grievance management.

The SEP briefly describes the public consultation carried out to date and defines activities that will be implemented by the Project to inform stakeholders about the nature and the potential impacts associated with the port modernisation.

The SEP contains a stakeholder table where relevant stakeholders are identified with the most appropriate communication channels and strategies, information disclosure requirements and grievance processes that will be adopted. If there are stakeholders who are not included in the SEP they can get in touch with the contact provided above from the Consortium to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

Specific objectives of the SEP are detailed below:

- Define the Project area;

- Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;
- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Ensure stakeholders have access to information on Project activities in a timely manner;
- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that any vulnerable groups are identified and consulted;
- Establish clear mechanisms for answering stakeholders' questions, concerns and grievances; and
- Document formal consultation and information disclosure activities, define stakeholder tracking and records management system.

### **1.3. Scope of the Plan**

This SEP covers both the construction and operational phases of the Damietta Port Modernisation Project, including the contractor's activities. The Plan comprises the following sections:

- Chapter 2 – Project Background
- Chapter 3 – Consultation and Disclosure
- Chapter 4 – Stakeholder Identification
- Chapter 5 – Stakeholder Engagement Programme
- Chapter 6 – Reporting and Grievance Mechanism

## 2. PROJECT BACKGROUND

The European Bank for Reconstruction and Development (the “EBRD”), the International Finance Corporation (the “IFC”), Deutsche Investitions-und Entwicklungsgesellschaft (“DEG”), Asian Infrastructure Investment Bank (AIIB), and Proparco are considering financing in consortium the construction of a second container terminal (CT2) at Damietta Port. The Project is located within the existing concession area of Damietta Port, approximately 73km west of Port Said and 12km from Damietta city. The port sits within the Damietta administrative centre in the Damietta Governorate. The Port has roots dating back to Greek ownership in the early 300s BC, Romans and then Arabs in 7 AD.

The second container terminal will be constructed on a previously constructed quay. The Damietta Port Authority (DPA) have previously developed the quay wall infrastructure alongside dredging and deepening works in preparation for the second container terminal in the Port. The container terminal included in the proposed Project programme will increase the capacity of the port and enable it to accommodate largescale container ships.

Figure 1 – Map of the CT2 location



Figure 2 – Map of the CT2



The DPA currently operates thirteen docks/berths and six terminals at Damietta Port, handling export of agricultural products, fertilizers, and furniture and import of goods such as petrochemicals, cement, grains, flour, and general cargo, as well as containers.

The Project will involve dredging of the basin and the construction of basic infrastructure (including the quay wall) for a second container terminal in the Port. The objective of the expansion is to increase the Port's estimated capacity to 4 million TEUs/year by 2050. The second container terminal will occupy an area of approximately 130 ha and will be located within the existing Damietta Port concession area; the area of the extension will be approximately 300 m wide, 1,500 m long and 17 m deep<sup>1</sup>. Figure 3 shows the proposed location of the second container terminal in relation to the existing Port.

The Consortium is proposing investment for the construction of basic infrastructure for the second container terminal. The operation of the container terminal and investment in additional infrastructure onsite (e.g., buildings and equipment) will be tendered to the private sector and will be privately operated under a 30-year concession agreement.

## 2.1. Project Developer Structure

Organisation	Role
DPA	<p>Has overall responsibility of Damietta port operation and management. It is responsible of maintaining port channel, internal roads, towage, and pilotage.</p> <p>DPA operates the port on Landlord-tenant model, port facilities like berths are allocated to parties for operations involving cargo handling.</p> <p>Construction of quay and basin dredging works for CT2 is undertaken by DPA and once completed the facilities will be handed over to the Consortium;</p> <p>DPA's facilities like WWTP and Incinerators might also be shared with CT2 like all other tenants of the port.</p>
Damietta Alliance Container Terminal S.A.E, aka the "Consortium", consisting of Hapag-Lloyd, Eurogate and Contship Italia, Middle East Logistics & Consultants Group and Ship & C.R.E.W. Egypt S.A.E	<p>Develop and operate the Port of Damietta's upcoming Terminal 2 facility, once the project is handed over by the DPA.</p> <p>Would be responsible for the implementation of the ESAP.</p>
Arab Contractors and Archirodon	<p>Currently constructing the terminal quays, including carrying out dredging works, are being employed by DPA directly.</p>

<sup>1</sup> Wantania Environmental Services (2006) The New Containers Terminal: Damietta Port, Egypt. Part II: Social and Environmental Impact Assessment.

Inros Lackner	Terminal 2 design and construction supervision contractor, hired by Consortium.  Inros Lackner will be responsible for all construction supervision activities, including ensuring appropriate H&S systems and processes are in place and being upheld on site by all contractors.
N/A	Terminal 2 construction contractors for all over Quay construction work, will be taken on board by the Consortium directly.

### 3. CONSULTATION AND DISCLOSURE

#### 3.1. National Legislative Requirements

In accordance with Egyptian EEAA Guidelines of Principles and Procedures for Environmental Impact Assessment (EIA), the Project is classified as a **Category C** project, as prescribed in Paragraph 4 (page 68) and Item 62 of the Category C EIA List.

The Egyptian EIA regulations 'Law 4/1994<sup>2</sup> on the Protection of the Environment' and 'Law 9/2009 amending some provisions of Law No.4/1994 outlines provisions for public consultation for Category C Projects. For Category C Projects, EEAA requires consultation with the community and concerned parties to be conducted as part of the EIA development. All stakeholders should be invited, and all attendees should be provided with the necessary information about the Project.

The Environment Egyptian Environmental Affairs Agency (EEAA) *Guidelines of Principles and Procedures for Environmental Impact Assessment (EIA) 2009* provides detailed information regarding the scope of public consultation, methodology and documentation thereof. These are outlined in:

- Paragraph 6.4.3.1 Scope of Public Consultation
- Paragraph 6.4.3.2 Methodology of Public Consultation
- Paragraph 6.4.3.3 Documentation of the Consultation Results
- Paragraph 6.4.3.4 Requirement and Scope of the Public Disclosure

#### 3.2. Lenders' Requirements

##### EBRD Performance Requirements (2019)

The Project will adhere to EBRD Environmental and Social Policy (ESP) 2019 and the EBRD Performance Requirements (PRs). The EBRD PR 7 (Indigenous Peoples) and PR 9 (Financial Intermediaries) are not applicable for this Project.

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<sup>2</sup>Law 4/1994 was last amended in 2015, followed by amendments to the executive regulations in 2016 and 2017. Amendments to the law and executive regulations do not pertain to stakeholder engagement or public consultation, therefore they have not been captured in this SEP.

The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

- Identify the various individuals or groups i) who are affected or likely to be affected by the Project; or may have an interest in the Project.
- Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.
- Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

### IFC Performance Standards (2012)

The Project will adhere to the IFC Performance Standards on Environmental and Social Sustainability 2012 and the IFC Performance Standards (PSs). The IFC PS 7 (Indigenous Peoples) is not applicable for this Project.

IFC-financed projects are expected to be designed and operated in compliance with good international practices and, to this end, IFC have defined eight Performance Standards (PSs) covering the key areas of environmental and social issues and impacts. The main PR associated with Stakeholder Consultation and Information Disclosure is PR 1. The key pertinent requirements of this PR are:

- Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders
- The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities
- The client will provide Affected Communities with access to relevant information<sup>26</sup> on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.

## DEG Guidelines for Environmental and Social Sustainability

DEG is guided by the following principles:

- Environmental and social sustainability encompasses the protection of people's lives and health, the economic basis of their livelihood and their ecological, social and cultural environment as well as the sustainable use of natural resources. The consideration of these aspects is an indispensable principle of sustainable development for DEG;
- Attention to environmental protection and sustainable use of resources as well as adherence to social principles all make a vital contribution to the future viability of any enterprise;
- Compliance with international environmental and social standards as well as environmentally relevant safety, health and technical standards in production and products is a major contribution towards integrating our partner countries into the global economy, which is what we wish to promote;
- DEG supports the implementation and advancement of environmental protection and international social standards in its partner countries;
- Project assessment must always take into consideration the ecological and social interests of people affected by the impact of projects co-financed by DEG; and
- These principles are also a benchmark for DEG itself and it applies high ecological and social standards to its own organisation and business activities.

## AIIB Environmental and Social Policy (2021)

The project is also required to meet the AIIB Environmental and Social Policy (2021), which sets forth mandatory environmental and social requirements applicable to all Projects and brings them into one single policy that enhances consistency and coherence, and more comprehensively addresses environmental and social impacts and risks. The Environmental and Social Standards are as follows:

- ESS 1: Environmental and Social Assessment and Management;
- ESS 2: Land Acquisition and Involuntary Resettlement; and
- ESS 3: Indigenous Peoples.

## WBG Environmental, Health and Safety (EHS) General Guidelines

The project should also follow the WBG EHS Guidelines, which are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) and are referred to in the World Bank's Environmental and Social Framework and in IFC's Performance Standards. The EHS Guidelines contain the performance levels and measures that are considered acceptable and achievable to the World Bank Group within facilities at reasonable costs by existing technology.

The WBG environmental, Health and Safety Guidelines for Ports, Harbours and Terminals are also significant to guide on potential impacts that are to be addressed and best practices specifically for Port sector.

### 3.3. Existing Stakeholder Engagement and Community Awareness Programmes

According to the EIA regulation (Law 105/2015), the Second Port Terminal is classified as a Category C project in accordance with the national classification of the EAAA, which means a project with potentially significant environmental impact. A public consultation is required for the Category C project.

There are three committees at the DPA that are involved in stakeholder engagement: the committee engagement with government bodies, the committee for security issues engaging with local policy, and the citizen committee which manages public concerns and complaints. Currently, the DPA is using existing communication tools such as its Facebook page and email newsletter to obtain public views and concerns. The Facebook page is updated regularly and provides day to day information about the port activities, including cargo shipping and present photos (see Figure 3 below). Online news reports are also regularly available about the DPA's operations on the DPA website (<https://www.dpa.gov.eg/>) and contains up to date information on the ports operations, events, and partnerships.

The DPA's existing communication channels should be used to notify the public of this SEP and to explain the grievance mechanism process which should become the primary channel for communicating the public's concerns and grievances about the Project.

Figure 3 - DPA Facebook Page (2023)



Source: <https://www.facebook.com/damietta.port>

Consortium has already carried out in depth meetings with Damietta Port Authority (DPA) and Inros Lackner in order to plan for the construction of the new terminal, however no engagement has yet been carried out by the Consortium partners with other key stakeholders especially with local communities. The DPA does not currently hold any meetings with the public and as such the Consortium will undertake this as part of the scope of the SEP prior to and throughout the construction phase.

## 4. STAKEHOLDER IDENTIFICATION

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

- a) Primary stakeholders - individuals and groups who are affected directly by the Project; and
- b) Secondary stakeholders - those parties which have influence on, but are not necessarily directly impacted by, the Project, and those indirectly impacted by the Project

The key stakeholders identified are presented in Table 1 below.

**Table 1: Key Identified Stakeholders and Methods of Engagement**

Stakeholder Category	Type	Name	Interest in Project
Primary	Project Shareholders / Internal Stakeholders	the Consortium	Decision-making process, Project implementation, and stakeholder engagement.
		DPA	
	Local Communities	Houses adjacent to the port area and residents of Izbat Khamsa, Abd Elkader village, Ash Sharayid village and Al Sinanniyah village.	Communities and users of local facilities in proximity to the site are likely to be directly and indirectly affected as a result of the development of the Project e.g., construction related noise pollution, dust, and increased traffic.
		Wider population of Damietta City	
		Local farmers	
		Religious buildings (three Christian Churches, one Ottoman building, and five Mosques) located southeast of the Port	
Vulnerable groups (women and girls)	Local women in the Project area are more vulnerable to community related impacts due to predefined gender roles which can limit		

Stakeholder Category	Type	Name	Interest in Project	
			their decision making influence.	
		Seasonal herders	Interest in maintaining access to seasonal herding land along the road to the eastern breakwater	
	Local Businesses	General Silos Co, Eni Store (warehouse), Mopco (Misr) (fertiliser production company), Rehab Damietta for Edible Oils (cooking oil manufacturer), Methanex Plant, Spanish Egyptian Gas Company (SEGAS) complex, Roubin Plant owned by the United Gas Derivatives Company, and El Rehab For Mills	For shipping and warehousing companies, interest in increased capacity to berths and cargo handling. General interest for all companies in potential increase in business opportunities through the modernisation. Concerns over traffic disruption to day-to-day operations during construction.	
	Fishermen	Fishermen within Fishing Associations (Fishermen Association, Association of Fishing Boats Owners, and the Fishermen Fund)	Unlicensed fishermen and fishermen not part of associations	Potentially affected by unplanned events i.e., spillages into the marine environment, and any future cumulative impacts of vessel movements on traps and nets by breakwaters.
	Contractor and Construction workers	Arab Contractors and Archirodon	Contractors will be affected by decisions regarding continued construction, and changes in contract terms. They are also exposed to construction related health and safety including work accidents and occupational diseases.	
Supervising Engineer	Inros Lackner	Monitoring and guiding the implementation of the		

Stakeholder Category	Type	Name	Interest in Project
			CEMP developed by the EPC Contractor.
Secondary	Permitting bodies and governmental agencies	The EEAA	Submission and approval of permitting and monitoring requirements to be undertaken
		Damietta Governorate	
	Neighbouring companies and port users	Port of Damietta, Methanex Plant, Spanish Egyptian Gas Company (SEGAS) Liquefied Natural Gas (LNG) Complex, Roubin Plant owned by the United Gas Derivatives Company, and El Rehab For Mills, Silos and Storage Factory	Potentially affected by overlapping unloading and loading activities during operations.
Lender	Lending Organisations	EBRD, IFC, DEG, AIIB, WBG, and Proparco	Provide the loan to finance the Project, alongside certain environmental, social and technical requirements.

## 5. STAKEHOLDER ENGAGEMENT PROGRAMME

### 5.1. Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 2 below. The objectives of external communications are to provide regular engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by the Lenders' requirements and Egyptian national legislation.

The SEP is a live document that will be revisited and updated, if necessary, on at least an annual basis (or when changes are made) to reflect the changes in stakeholder engagement due to project developments and new stakeholders. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence.

The HSSE Manager will be responsible for ensuring the timely disclosure of project information to stakeholders in a culturally appropriate manner in accordance with the level of Project activities. The information will be provided in Arabic and will cover all the key stages of the Project from the design to the decommissioning stage. At this stage, the following documents will be disclosed for effective stakeholder communication:

- Non-Technical Summary
- Stakeholder Engagement Plan

The information above will be accessible to the public, including the affected communities. Hard copies of the related documents will be available at the Consortium's offices at Damietta Port, Damietta Governorate office, Damietta Port Center, Entrance gate of Port (Export Gate) and local unit in Al Sananiya Village. Project information will also be distributed through local newspapers, media and on the Consortium website.

## 5.2. Stakeholder Engagement Programme

The Stakeholder Engagement Programme envisages that consultation meetings will take place with relevant interested parties during the Project design phase prior to the commencement of construction, during construction and during the Project's operational phases. Consultation activities will be ad minimum as per Table 2 below. The consultation and engagement programme outlined within this SEP has been defined to ensure that the following objectives are met by the Project:

- Information about the Project will be disclosed in a timely manner to key stakeholders, and will be available in both Arabic and English.
- The engagement activities conducted by the DPA will programme prioritise informed participation and meaningful two-way consultation with affected stakeholders.
- Stakeholders concerns and issues will also be addressed in a timely and appropriate manner through the implementation of the Grievance Mechanism.

Stakeholders will be able to attend consultation meetings and be informed of project activities, contact persons and the established Grievance Mechanism in detail, including channels for receiving information. Minutes will be taken at all stakeholder meetings and will include a signed attendance register.

Any concern or grievance raised prior or during the project implementation will be collated and logged by the Consortium. These grievances can be submitted anonymously. Stakeholders will be able to use the channels that are most convenient for them for submitting grievances and receiving Project-related information.

All complaints and queries received through the Grievance Mechanism will be reviewed and responded to in accordance EBRD PR 10 and international best practice (See Section 6 for further details on the Grievance Mechanism)

The Stakeholder Engagement Programme is detailed in Table 2 below:

**Table 2: Future Stakeholder Engagement Programme**

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
<ul style="list-style-type: none"> <li>▪ <b>Project Shareholders / Internal Stakeholders</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Internal consortium meetings on an as-needed basis</li> <li>▪ At least one E&amp;S kick-off meeting with</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates on the ESAP, SEP, ESMP and CEMP implementation if necessary.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Meetings held before construction upon contract signing, and</li> </ul>

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	the Supervising Engineer and Contractor and to outline E&S requirements.		during construction
<ul style="list-style-type: none"> <li>▪ <b>Permitting bodies and governmental agencies</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Submission of permitting requests by the Consortium to the EEAA; and</li> <li>▪ Ongoing communications and official correspondence as needed.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Submission and approval of permitting for the Project construction and monitoring requirements for the Consortium</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prior to construction phase.</li> </ul>
<ul style="list-style-type: none"> <li>▪ <b>Local Communities</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ At least one consultation meeting with the Consortium and Supervising Engineer held in Damietta for residents in neighbouring houses and Izbat Khamsa, Abd Elkader, Ash Sharayid and Al Sinanniyah villages. This should be advertised in these settlements via Damietta Governorate and local community communication channels, posters and on the Project website.</li> <li>▪ Liaise with representatives of the Churches and the Mosques to organise one community workshop for each faith in each facility.</li> <li>▪ Informal focus groups with nomadic herders to facilitate ongoing consultation in easily accessible community spaces</li> </ul>	<ul style="list-style-type: none"> <li>▪ Raising awareness on the Project components, use of the grievance mechanism, and opportunity for community queries.</li> <li>▪ Updates on the status of the Project programme including any changes to the construction timeline.</li> <li>▪ Explaining the Grievance Mechanism to vulnerable groups including how to raise complaints relating to land use and Gender Based Violence and Harassment (GBVH)</li> <li>▪ Community workshops for religious organisations to present an introduction to the Project and its potential impacts.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Community consultation meetings, workshops and vulnerable groups focus groups as soon as possible prior to commencement of construction.</li> <li>▪ Website project updates throughout the construction phase.</li> <li>▪ Ongoing community liaison with community representatives and through the grievance mechanism.</li> </ul>

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	<p>near to the herding land.</p> <ul style="list-style-type: none"> <li>▪ Facilitate at least two women only focus groups to inform women in the community of the Project and gain feedback.</li> <li>▪ Ongoing updates on the Project website and through local community communication channels to at least once per month during construction.</li> </ul>		
<ul style="list-style-type: none"> <li>▪ <b>Neighbouring companies and port users</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Meetings between the Consortium, DPA, and the neighbouring port companies Port of Damietta, Methanex Plant, Spanish Egyptian Gas Company (SEGAS) Liquefied Natural Gas (LNG) Complex, Roubin Plant owned by the United Gas Derivatives Company, and El Rehab For Mills, Silos and Storage Factory on a needs basis.</li> </ul>	<ul style="list-style-type: none"> <li>▪ An agreement to be developed between the companies and the Project to reduce the possibility of overlapping unloading or loading activities during operation.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prior to development of the Emergency Response Plans and the operational phase.</li> </ul>
<ul style="list-style-type: none"> <li>▪ <b>Fishing Associations</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Focus group meetings with each of the fishing associations (Fishermen Association, Association of Fishing Boats Owners, and the Fishermen Fund) attended by the Consortium periodically on a needs basis.</li> <li>▪ Facilitate engagement with</li> </ul>	<ul style="list-style-type: none"> <li>▪ Consultation with the fishermen on their activities and to identify potential economic impacts.</li> <li>▪ Updates on the Project implementation on an as-needed basis.</li> <li>▪ Provide updates on navigation data of Project vessels and any</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prior to construction and as needed during construction and operation if required.</li> </ul>

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	unlicensed fishermen on navigation updates to prevent collisions and damage to nets.	changes in activities to prevent collisions and protect nets.	
<ul style="list-style-type: none"> <li>▪ <b>Supervising Engineer</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Regular in-person EHS Meetings attended by Inros Lackner, the Consortium and Contractors.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates on the ESAP, SEP and CESMP implementation on an as-needed basis</li> <li>▪ E&amp;S issues and data shared with Supervising Engineer to develop resolutions to issues found.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Meetings to be held on a monthly basis prior to contract signing and during construction.</li> </ul>
<ul style="list-style-type: none"> <li>▪ <b>Lenders</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Annually and on an as-needed basis, environmental, social and health &amp; safety updates.</li> <li>▪ Annual Environmental and Social Reports.</li> <li>▪ Provided through meetings and/or email by the Project Director.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates on the ESAP, SEP, and CEMP implementation and overall E&amp;S performance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Annually and on an as-needed basis meetings before construction, during construction, and during the duration of the project.</li> </ul>

For more information and comments, stakeholders can use the contact information below:

**Name: Andreas Russler**

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In summary of the table above, the key communication methods for this assignment are described below:

### Consortium E&S Meetings

These meetings will provide time for the Consortium to organise the implementation of environmental and social (E&S) actions, as well as an opportunity for the Supervising Engineer and Contractor to provide updates on their implementation of the CEMP and E&S actions during construction. The interaction between the Consortium, the Supervising Engineer and the Contractor will be stipulated in their

scope of works and included in their individual contracts. This will involve regular communication between all three parties.

### **Community Consultation Meetings and Religious Workshops**

The Project measures and activities will be explained through at least one public consultation meeting and community workshops at local places of worship which will be held in Damietta and advertised in nearby community buildings. Interested community members, including business owners, residents in surrounding communities, informal leaders, religious leaders, and educational heads will be able to meet with the Consortium's HSSE Manager, before construction commences to pass on their queries and to be informed on Project progress and on on-going issues. The meeting(s) and workshops will raise awareness on the Project's key components, potential impacts, and how stakeholders can raise complaints through the grievance mechanism. Formal minutes and attendance registers must be taken during this meeting and any future public consultation meetings. The Supervising Engineer should also attend this meeting.

### **Gender Sensitive Focus Groups**

The gender sensitive focus groups will be women only and will enable local women to understand the Project in greater detail. In particular, the focus groups will explain the Grievance Mechanism including how to raise complaints relating to Gender Based Violence and Harassment (GBVH) and will provide a channel for women to provide feedback.

### **Fishing Associations Focus Group Meetings**

The focus groups will aim to ensure that the requirements and opinions of fishermen are understood and mainstreamed within the design, development, and execution of the Project. The consultation will provide a setting for fishermen affected by this Project to voice their opinions and concerns, and this will be carried out before and during the construction stage of the Project by a representative from the Consortium.

### **Informal Focus Groups with Nomadic Herders**

Informal focus groups will be set up with nomadic herders to facilitate ongoing consultations throughout the Project lifecycle and update them on developments to construction and operation. The focus groups will be held in easily accessible community spaces near to the herding land.

### **Lender E&S Meetings**

The Consortium will provide annual (and on-a-needs basis) environmental, social, health and safety updates to the Lenders during the construction phase and operation phase. These updates will demonstrate the implementation of HSSE actions agreed before the loan ratification. This includes actions to be carried out by the Contractor in the CEMP and the Supervising Engineer.

## 6. REPORTING AND GRIEVANCE MECHANISM

### 6.1. Monitoring, Reporting and Feedback Mechanisms

The HSSE Manager will monitor the communication channels and will provide feedback as appropriate. A complaint box outside the main Project site will be available for stakeholders during the construction and operation phase and complaints can also be submitted by emailing Consortium. Any complaints will be registered in a log for complaints supported by evidence of closure.

In order to monitor the implementation of this SEP and the functioning of the grievance mechanism, the Consortium will confirm to the Lenders that the arrangements are in place and operating before designs are finalised and construction begins. This will include the sharing of notes, minutes and/or documentation on engagement activities undertaken, including all information disclosure undertaken as part of the SEP, and a summary of complaints.

### 6.2. Grievance Mechanism

The Consortium will operate a Grievance Mechanism, established in-line with international best practice, which will be supervised and implemented by the HSSE Manager. Any comments or concerns can be brought to the attention of the company verbally (in person or over the phone) or in writing by email or filling in a grievance form (see Appendix 1). The grievance form can also be submitted in person in the complaints boxes at the Project site. The Grievance Mechanism will also enable anonymous grievances to ensure confidentiality of the complainant in the case of GBVH complaints.

The grievance form and information on the procedure (including contact persons) will be made available on the Project website and during engagement activities. Information banners will also be placed on designated noticeboards around the site perimeter.

All grievances, including anonymous submissions, will be recorded in the grievance mechanism log. The Supervising Engineer and HSSE Manager will cooperate closely, sharing all information regarding any complaints or dissatisfaction.

The grievance log will store the following information on the complaints received:

- Complaint number
- Category (aka subject of the grievance)
- Name of complainant (if provided)
- Complainant gender
- Complainant disability status
- Complainant address and contact details
- Date of complaint receipt
- How complaint was received
- Who received the complaint

- Description of the issues/complaints
- Date of response
- Date of final resolution
- Entities involved
- Status of the issue
- Notes on current status e.g. resolution activities planned and progress
- Number of days between complaint receipt and complaint acknowledgement
- Number of days between complaint receipt and complaint resolution

### 6.3. Grievance Resolution

If grievances are submitted on site, the Supervising Engineer will be responsible for logging complaints which will then be solved by the HSSE Manager according to Stage 1 of the Grievance Mechanism process. In case the Consortium cannot solve the complaint, further information is requested from the complainant and a grievance meeting with the Supervising Engineer and Project Director will be established as described in Stage 2. Stakeholders have the opportunity to use one of the stages for submitting grievances. They can directly apply to Stage 2.

All verbal or written complaints or grievances will be logged immediately after they are received by the . Complaints will be acknowledged and responded to (first response) within 5 working days. Resolution will be proposed within 10 working days for Stage 1 and 30 working days for Stage 2 from acknowledgement of the grievance, however the HSSE Manager will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt. Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

Grievances submitted will be solved and followed-up in accordance with the procedures given below:

- Stage 1 – HSSE Manager receives and solves complaints. If at Stage 1 the complainant’s grievance is not solved, he/she will be informed about grievance resolution procedures of Stage 2. The complainant has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. The HSSE Manager will be aware of all the grievances submitted at Stage 1 through the grievance log, and will monitor their resolution remotely.
- Stage 2 – The HSSE Manager receives and solves complaint. A Grievance Meeting attended by the HSSE Manager, Project Director, and Supervising Engineer will be set up to resolve complaints (see Appendix 1).

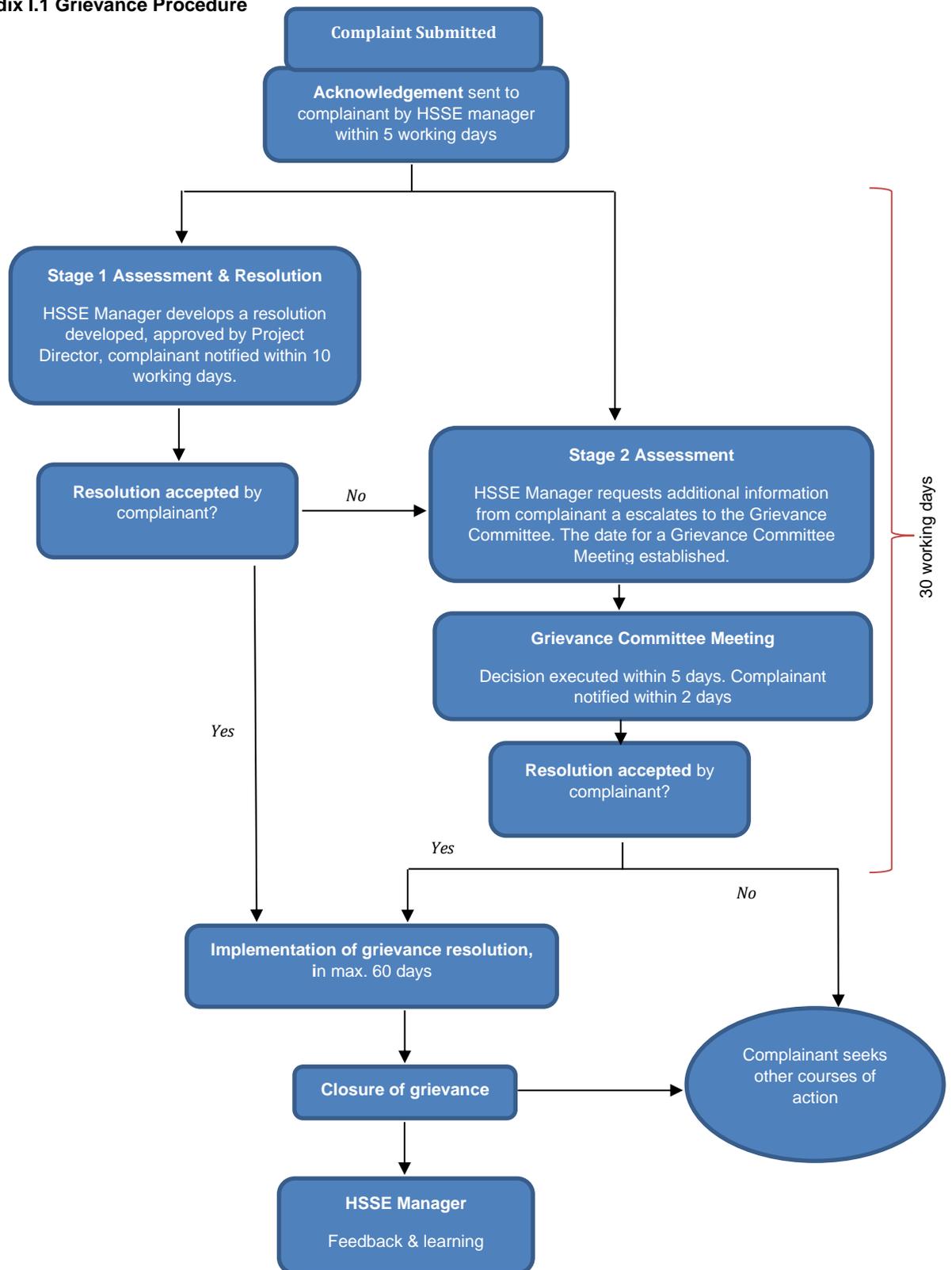
The Complainant has the right to apply to the Court in case his/her complaint was not resolved through either Stage 1 or Stage 2, or directly without use of the grievance mechanism.

#### **6.4. Roles and Responsibilities**

The Consortium has overall responsibility for project implementation and safeguard compliance. The contact below is responsible for ensuring all Project-related grievances are carried out in accordance with Egyptian legislation as well as the Lenders' E&S requirements:

# APPENDIX I – Complaint Procedure and Grievance Form

## Appendix I.1 Grievance Procedure



**Appendix I.2. Grievance Form**

Reference No:	
Full Name	
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information  Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _____
Language  Please mark your preferred language for communication	<input type="checkbox"/> Arabic <input type="checkbox"/> English <input type="checkbox"/> Other
Description of Incident or Grievance:                      What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return this form to:

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